

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	DECLARATION OF CHRISTOPHER M.
CORRECTIONS CORPORATION OF)	WOOD IN SUPPORT OF REPLY IN
AMERICA, et al.,)	FURTHER SUPPORT OF LEAD
Defendants.)	PLAINTIFF'S MOTION FOR CLASS
_____)	CERTIFICATION, APPOINTMENT OF
	CLASS REPRESENTATIVE AND
	APPOINTMENT OF CLASS COUNSEL

I, CHRISTOPHER M. WOOD, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Tennessee, including this Court. I am a member of Robbins Geller Rudman & Dowd LLP, Lead Counsel for Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund and the proposed Class in the above-captioned action. This declaration is made in support of Lead Plaintiff's Reply in Further Support of Lead Plaintiff's Motion for Class Certification, Appointment of Class Representative and Appointment of Class Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit D: Transcript of Deposition of Lucy P. Allen, dated October 10, 2018;
- Exhibit E: Rebuttal Report by Professor Steven P. Feinstein, Ph.D., CFA, dated October 26, 2018 [REDACTED];
- Exhibit F: Thomson Reuters StreetEvents transcript "CXW - Corrections Corp of America Responds to the Department of Justice's Decision to Reduce Reliance on Privately Operated Prisons Conference Call," dated August 19, 2016 and Exhibit 4 to Deposition of Lucy P. Allen;
- Exhibit G: Email from Bart Verhulst to Jeb Beasley, Subject: "Re: fyi - Adams/BOP-Contracted Facilities (Article from The Nation on deaths in BOP-contracted facilities with strong focus on Adams)," dated June 16, 2016 (Bates No. CORECIVIC_0045369-CORECIVIC_0045385) [FILED UNDER SEAL];
- Exhibit H: Email from Jeb Beasley to Wendy, Subject: "Cibola County Correctional Center," dated August 1, 2016 (Bates No. CORECIVIC_0090 867-CORECIVIC_0090868) [FILED UNDER SEAL];
- Exhibit I: SunTrust Robinson Humphrey analyst report "Renegotiation With ICE Ongoing; Maintain Neutral," dated August 4, 2016 and Exhibit 10 to Deposition of Lucy P. Allen;
- Exhibit J: Canaccord Genuity analyst report "Upgrading CXW to BUY following dividend cut, lowered risk, and external growth opportunity," dated December 12, 2016 and Exhibit 11 to Deposition of Lucy P. Allen;
- Exhibit K: Wells Fargo Securities analyst report "CXW: First Look - Q4 Beat - Narrows '17 Adj EBITDA Outlook," dated February 9, 2017 and Exhibit 12 to Deposition of Lucy P. Allen;

- Exhibit L: Matt Zapotosky and Chico Harlan, “Justice Department says it will end use of private prisons,” The Washington Post, dated August 18, 2016;
- Exhibit M: Email from Stacey Stone to Linda White, Subject: “FW: CCA 401(k) Plan - Memo from the Investment Committee,” dated August 31, 2016 (Bates No. CORECIVIC_1306140) [FILED UNDER SEAL];
- Exhibit N: SunTrust Robinson Humphrey “Featured Transactions” webpage;
- Exhibit O: Corrections Corporation of America press release, “CCA Appoints Stacia A. Hylton to Its Board of Directors,” dated August 11, 2016 and Exhibit 8 to Deposition of Lucy P. Allen;
- Exhibit P: Corrections Corporation of America press release, “CCA Declares Quarterly Cash Dividend of \$0.54 Per Share,” dated August 11, 2016 and Exhibit 7 to Deposition of Lucy P. Allen;
- Exhibit Q: Corrections Corporation of America document “The Nation Talking Points 06.16.16,” dated June 16, 2016 (Bates No. CORECIVIC_0104733-CORECIVIC_0104735) [FILED UNDER SEAL];
- Exhibit R: Email from Jonathan Burns to Steve Owen, Subject: “The Nation - BOP immigrant corrections articles,” dated February 17, 2016 (Bates No. CORECIVIC_0698156-CORECIVIC_0698157) [FILED UNDER SEAL];
- Exhibit S: Corrections Corporation of America press release, “CCA Appoints Stacia A. Hylton to Its Board of Directors,” dated August 11, 2016;
- Exhibit T: Corrections Corporation of America press release, “CCA Declares Quarterly Cash Dividend of \$0.54 Per Share,” dated August 11, 2016;
- Exhibit U: Corrections Corporation of America, press release, “CCA Declares Quarterly Cash Dividend of \$0.54 Per Share,” August 11, 2016;
- Exhibit V: Transcript of Deposition of Lucy P. Allen, Erica P. John Fund, Inc. v. Halliburton Co., No. 3:02-CV-1152-M (N.D. Tex. 2015), ECF No. 589, filed October 30, 2014, dated September 22, 2014;
- Exhibit W: Email from Liz Mair to Pablo Paez and Steve Owen, Subject: “Re: Opinion Pieces,” dated August 23, 2016 (Bates No. GEO000050-GEO000053) [FILED UNDER SEAL];
- Exhibit X: Email from Liz Mair to Steve Owen, Pablo Paez, and Mike Murphy, Subject: “Took me a couple of days to deal with this,” dated August 18, 2016 (Bates No. GEO000497), attaching article by Caroline Simon, “DOJ: Private prisons are more dangerous than government prisons - for inmates and guards,” Business Insider, dated August 12, 2016 [FILED UNDER SEAL];
- Exhibit Y: Email from Ronald Thompson to Michael Nalley, Subject: “RE: OIG Report,” dated August 11, 2016 (Bates No. CORECIVIC_1248558) [FILED UNDER SEAL];
- Exhibit Z: Email from Jamie Tucker to Carter Burwell, et al., Subject: “BOP Update,” dated February 27, 2017 (Bates No. AG00965-AG00966) [FILED UNDER SEAL];

Exhibit AA: Geert De Lombaerde, “CCA hammered after word of DOJ private-prison exit,” Nashville Post, dated August 18, 2016; and

Exhibit BB: Jamie McGee and Dave Boucher, “Justice Dept. to end CCA private prison contracts,” The Tennessean, dated August 19, 2016.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 26th day of October 2018, at Nashville, Tennessee.

s/ Christopher M. Wood
CHRISTOPHER M. WOOD

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 26, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood

CHRISTOPHER M. WOOD

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Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al

Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)